



## **Air Quality Permitting Statement of Basis**

**July 8, 2004**

**Tier II Operating Permit  
No. T2-030067**

**Tyson Fresh Meats, Kuna  
Facility ID No. 001-00030**

**Prepared by:**

**Almer Casile, Permit Writer  
AIR QUALITY DIVISION**

**FINAL PERMIT**

## Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE .....	3
1. PURPOSE.....	4
2. FACILITY DESCRIPTION .....	4
3. FACILITY / AREA CLASSIFICATION.....	4
4. APPLICATION SCOPE.....	4
5. PERMIT ANALYSIS.....	4
6. PERMIT CONDITIONS .....	5
7. PUBLIC COMMENT.....	5
8. RECOMMENDATION.....	6
APPENDIX .....	7

## Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	Environmental Protection Agency
HAPs	Hazardous Air Pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
m	meter(s)
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
PTE	Potential to Emit
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO <sub>2</sub>	sulfur dioxide
TSP	Total Suspended Particulate-
VOC	volatile organic compound

## **1. PURPOSE**

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.400 et seq *Rules for the Control of Air Pollution in Idaho (Rules)* for issuing Tier II operating permits.

## **2. FACILITY DESCRIPTION**

Tyson Fresh Meats, Inc (Tyson) in Kuna is a beef processing and rendering facility which processes about 225 head of cattle per hour. The cattle are butchered, cleaned, split in half, quickly chilled to about 31 degrees Fahrenheit (°F), and sent to Pasco, Washington, for further processing. The hides are removed and sent to Pacific Hides in Nampa. The contents of the stomach are removed and piped to a truck loadout. The rest of the animal parts are ground up and rendered. The rendered material is separated into liquid and solid products. The liquid, edible product is used for deep fat frying. The solid product is used for animal food. The blood is dried and used for animal food.

## **3. FACILITY / AREA CLASSIFICATION**

Tyson is defined as a synthetic minor facility because without permit limits on the potential to emit the SO<sub>2</sub> emissions could exceed 100 tons per year. The AIRS classification is "SM" because the potential to emit of SO<sub>2</sub> is limited to less than major source levels.

The facility is located within AQCR 64 and UTM zone 11. The facility is located in Ada County which is classified as unclassifiable for all criteria pollutants.

The AIRS information provided in the Appendix defines the classification for each regulated air pollutant at Tyson. This required information is entered into the EPA AIRs database.

## **4. APPLICATION SCOPE**

The facility has requested a name change and change in ownership from IBP, Inc. to Tyson Fresh Meats, Inc.

### **4.1 Application Chronology**

January 5, 2004	DEQ received application.
January 28, 2004	DEQ declared application incomplete.
February 26, 2004	DEQ received additional information
March 3, 2004	DEQ received additional information
March 4, 2004	DEQ received additional information.
March 5, 2004	DEQ received requests to withdraw the facility's proposed scrubber chemical change, and to change facility's name and ownership.
March 11, 2004	DEQ declared application complete.

## **5. PERMIT ANALYSIS**

This section of the Statement of Basis describes the analysis conducted for this Tier II operating permit.

### **5.1 Equipment Listing**

No equipment changes are associated with this permitting action.

## **5.2 Emissions Inventory**

There is not an increase emissions associated with this permitting action. Therefore, an emissions inventory is not required.

## **5.3 Modeling**

A modeling analysis is not required for this permitting action because there is not an increase in emissions.

## **5.4 Regulatory Review**

This section describes the regulatory review of the applicable air quality rules with respect to this Tier II operating permit.

IDAPA 58.01.01.404.04 ..... Permit Revision or Renewal

This rule establishes the requirements for Tier II operating permit revisions and renewals. Because emissions are not increasing, a public comment period is not required.

## **5.5 Fee Review**

A Tier II processing fee is not required for a facility name change/change of ownership.

## **6. PERMIT CONDITIONS**

The facility wide requirements of the permit have been updated. The format of the permit has also been updated. No substantive changes, however, have been made to the Tier II operating permit.

The permit conditions of the Blood Silo Airlocks section of the previous permit have been combined with the Blood Silo section, and the Blood Silo Airlocks section deleted from this final permit. The sections were combined because both sections pertained to the operation of and emissions from the Blood Silo. Permit Condition 6.5.2 has been changed to correct a transpose error. The annual throughput limit of "meat and bone meal produced" of Permit Condition 6.5.2 has been changed to be "dried blood produced". The new language is now consistent with the short-term emission throughput limit of the dried blood of Permit Condition 6.5.2 and with the annual throughput limit to the Blood Silo of Permit Condition 8.5.

Permit Conditions 6.8 and 6.9 have been changed to reference ORP. The previous permit interchanged the use of the phrase "oxidation reduction potential" and the acronym ORP in Permit Conditions 6.8 and 6.9. Though the phrase and the acronym are synonymous, the language has been changed to consistently use only the acronym.

## **7. PUBLIC COMMENT**

The change in name and ownership does not require a public comment period.

## **8. RECOMMENDATION**

Based on the review of the application materials, and all applicable state and federal regulations, staff recommends that DEQ issue final Tier II Operating Permit No. T2-030067 to Tyson.

ABC\bf

Permit No. T2-0300067

## **APPENDIX**

### **AIRS/AFS FACILITY-WIDE CLASSIFICATION DATA ENTRY FORM**

### AIRS/AFS FACILITY-WIDE CLASSIFICATION DATA ENTRY FORM

AIR PROGRAM	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	TITLE V	AREA CLASSIFICATION
POLLUTANT							A – Attainment U – Unclassifiable N – Nonattainment
SO <sub>2</sub>	SM						U
NO <sub>x</sub>	B						U
CO	B						N
PM <sub>10</sub>	B						U
PT (Particulate)	B						U
VOC	B						U
THAP (Total HAPs)	B						U
			APPLICABLE SUBPART				

**AIRS/AFS Classification Codes:**

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant, which is below the 10 T/yr threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).